

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

NAUTILUS INSURANCE COMPANY,

Plaintiff,

vs.

Richard Alexander Murdaugh, Sr., Cory Fleming,
MOSS & KUHN, P.A., Chad Westendorf, and
PALMETTO STATE BANK,

Defendants.

Civil Action No. 2:22-cv-1307-RMG

**DEFENDANT CORY FLEMING'S
PRELIMINARY EXHIBIT LIST**

Defendant, Cory Fleming ("Mr. Fleming"), respectfully submits the following list of exhibits he intends to or may present at trial:

No.	Description	Bates/Docket (if applicable)
1	JR Murphy memorandum to Konnor Owens dated July 11, 2018	Grantland depo., Ex. 1
2	Nautilus Insurance Company – policy detail	Grantland depo., Ex. 2
3	Amy Coryer email to JR Murphy, dated Nov. 12, 2018	Grantland depo., Ex. 3
4	David Rheney letter to Amy Cory, dated November 12, 2018	Grantland depo., Ex. 4
5	Scott Wallinger letter to Caitlin Crist and David Patrick, dated November 6, 2018	Grantland depo., Ex. 5
6	John Grantland email to Amy Coryer, dated November 27, 2018	Grantland depo., Ex. 6
7	John Grantland letter to Amy Coryer, dated January 7, 2019	Grantland depo., Ex. 7
8	John Grantland letter to Cory Fleming, dated January 9, 2019	Grantland depo., Ex. 8
9	John Grantland email to Amy Coryer, dated January 10, 2019	Grantland depo., Ex. 9
10	Amy Coryer/Nautilus internal memorandum, dated January 10, 2019 9:10 AM	Grantland depo., Ex. 10
11	Amy Coryer email to John Grantland dated February 15, 2019	Grantland depo., Ex. 11
12	John Grantland email to Amy Coryer, dated February 25, 2019 , 3:22 PM	Grantland depo., Ex. 12
13	John Grantland email to Amy Coryer, dated February 25, 2019 3:15 PM	Grantland depo., Ex. 13
14	John Grantland email to Amy Coryer, dated	Grantland depo., Ex. 14

	March 6, 2019 7:41 AM	
15	John Grantland email to Amy Coryer, dated March 6, 2019 7:40 AM	Grantland depo., Ex. 15
16	Amy Coryer email to John Grantland dated March 8, 2019 8:51 AM	Grantland depo., Ex. 16
17	John Grantland letter to Amy Coryer, dated March 11, 2019	Grantland depo., Ex. 17
18	John Grantland letter to Jon L. Austen, dated March 14, 2019	Grantland depo., Ex. 18
19	Rehabilitation and Geriatric Services - Independent Medical Examination, dated March 11, 2019	Grantland depo., Ex. 19
20	John Grantland email to Amy Coryer, dated March 18, 2019 8:25 AM	Grantland depo., Ex. 20
21	John Grantland email to Cory Fleming, Scott Wallinger, dated March 25, 2019, 12:14 PM	Grantland depo., Ex. 21
22	Amy Coryer email to John Grantland dated March 25, 2019, 6:27 AM	Grantland depo., Ex. 22
23	John Grantland email to Amy Coryer, dated March 25, 2019 12:38 PM	Grantland depo., Ex. 23
24	John Grantland email to Amy Coryer, dated March 29, 2019 7:54 AM	Grantland depo., Ex. 24
25	Amy Coryer email to John Grantland dated April 2, 2019 12:18 PM	Grantland depo., Ex. 25
26	Release (unexecuted) dated 2019	Grantland depo., Ex. 26
27	Petition for Approval of Settlement (unexecuted and not filed) dated 2019	Grantland depo., Ex. 27
28	Order Approving Settlement (unexecuted and not filed) dated 2019	Grantland depo., Ex. 28
29	Amy Coryer email thread with John Grantland dated April 17, 2019 4:53 AM	Grantland depo., Ex. 29
30	John Grantland letter to Cory Fleming dated April 22, 2019	Grantland depo., Ex. 30
31	Berkeley Insurance Company and Nautilus Insurance Company settlement check payable to Chad Westendorf, et al., dated April 18, 2019	Grantland depo., Ex. 31
32	John Grantland email to Amy Coryer, dated May 6, 2019 9:58 AM	Grantland depo., Ex. 32
33	Amy Coryer email thread with John Grantland dated May 10, 2019, 11:12 AM	Grantland depo., Ex. 33
34	Cory Fleming letter to John Grantland, dated May 13, 2019, enclosing original Order Approving Settlement	Grantland depo., Ex. 34
35	Order Approving Settlement, signed by Hon. Carmen T. Mullen, dated May 13, 2019	Grantland depo., Ex. 35
36	John Grantland email to Amy Coryer, dated May 14, 2019 6:10 AM	Grantland depo., Ex. 36

37	Email from Judge Mullen's law clerk to Renee Dillon, dated June 13, 2019 12:25 PM	Grantland depo., Ex. 37
38	John Grantland email thread with Cory Fleming dated May 14, 2019 8:33 AM	Grantland depo., Ex. 38
39	Cory Fleming email thread with John Grantland dated May 13, 2019, 3:41 PM	Grantland depo., Ex. 39
40	Order Approving Settlement, signed by Judge Carmen T. Mullen, dated May 13, 2019	Grantland depo., Ex. 40
41	Hon. Carmen T. Mullen's email thread to John Grantland, dated September 29, 2021 7:08 PM	Grantland depo., Ex. 41
42	Murphy & Grantland billing records for time March 19-21, 2019	Grantland depo., Ex. 42
43	JR Murphy letter to Cory Fleming dated November 14, 2018	Grantland depo., Ex. 43
44	Amy Coryer email thread with Jon Austen and John Grantland, dated March 25, 2019, 11:54 AM	Grantland depo., Ex. 44
45	Cory Fleming email thread with Tanya King, dated October 1, 2020 11:01 AM	Grantland depo., Ex. 46
46	Stipulation of Dismissal, filed October 6, 2020, 1:48 PM	Grantland depo., Ex. 47

Pursuant to Fed. R. Civ. P. 26(a)(3), the list of exhibits does not include those exhibits which may be needed for impeachment. Mr. Fleming may introduce additional exhibits that were exhibits to depositions in this matter, as well as any exhibit identified by Plaintiff or any other Defendant and reserves the right to do so and to supplement this list as appropriate.

Respectfully submitted,

/s/ Thomas A. Pendarvis

Thomas A. Pendarvis (Fed. Id. 5785)

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Counsel for Defendant, Cory H. Fleming
serving on a *pro bono* basis

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December 9, 2024